

December 10, 2018

Motorcycle Riders Association (MRA) comments to the Upper Applegate Watershed Restoration Project

To Donna Mickley, District Ranger

MRA would like to thank you for your efforts to improve recreation in the Applegate. We support the project with the following exceptions and comments:

On page 73 it is stated "The Mule Creek and Mule Mountain trails are currently not included on the Motor Vehicle Use Map due to the lack of a right of way access to the trail." This statement and the EA maps imply that the trail is open to other uses. If there is a legal problem with a right of way then it should include all travel and singling out motorcycles shows a bias by the FS. We would like it stated that this trail is technically closed to all travel until the easement issue can be rectified, or it should be re-opened to motorcycles. The same legal issues apply to motorized and non-motorized uses in this case. MRA has contacted the land owner and made offers to purchase an easement, however he appears to only be interested in a land trade. He is afraid of the liability of having his land open to the public, both motorized and non-motorized. We ask that the FS post this trail closed to all travel or open it to all travel, and that you make fixing this access issue a high priority. It is our belief this this problem can only be fixed in a timely manner with a reroute around the private property.

On page 105 it is stated that "...Hanley Gulch trail are within the allocation for Big Game Winter Range and would be subject to seasonal restrictions for use from November 1 through April 30 per the RRNF LRMP." However, the LRMP states on page 4-164 that "This area (Winter Range) does not include class I, II, and III streams or their associated riparian zones". Page 112 of the EA states "The proposed trail along the decommissioned bed of FS Road 2010200 road is located almost entirely within the Riparian Reserve of Hanley Gulch". Therefore we ask that this trail have no seasonal restrictions for Winter Range.

The MRA believes that the closing of any trail in the Upper Applegate area for 6 months out of the year for Deer and Elk Winter Range is excessive. Black Tailed Deer are not endangered or threatened, and many people even believe they are pests, causing damage to property and auto accidents. The biggest reason they have so much power over road and trail closures is for recreation, so that one group, hunters, can enjoy killing them a couple months a year. We are in favor of protecting them, but feel that 6 months is much too long, especially considering that recently many years have been warm and with very little snow. It is not uncommon that the snowpack on the ridges in the Upper Applegate does not come until January and is gone by the end of March. Father more, deer do most of their traveling at night as found in a 1996 ODFW study

where 87% of movement by bucks was after dark. There is almost no trail recreation after dark. Is it really necessary to close trails from Nov 1 to April 30? Can we have a shorter season or a season based on snowfall or weather? If, however, RRSNF insists on closing motorized trails then we insist that non-motorized trails have the same restrictions. MRA believes that there is **a strong bias toward OHVs concerning Winter Range closure rules**. OHVs are excluded from Winter Range, yet no other group is excluded. There are studies that show that hikers, bicyclists, skiers, dogs, shooters, and automobiles can all cause significant stress, and often more stress than an OHV to deer and elk. In "A Partial Review of the Effects of Human Activities on Wildlife" by Nora Hamilton of the BLM, they found that deer fled much faster from a person afoot (flight for 6.25 minutes) than a snowmobile (flight for 1.25 minutes). Big game are often more afraid of a human approaching them quietly and slowly (walking) than they are of an OHV approaching with plenty of warning. We believe that if OHVs are excluded then all users that cause significant stress must also be excluded. The RRNF Plan states on page 4-165 #3 that you should "Managed trails, motorized and **non-motorized**...to minimize conflict with wildlife...and winter range values. Under #6 it says "Control vehicle access in big game winter range **as needed** between November 1 and April 30 to prevent biological stress". It also gives leeway on page 4-178 #2 where it states the season is **approximately** Nov 1 and April 30 and under 2.d says "Allow off-road vehicle use ... when it will not conflict with winter range values". The RRNF Plan was written in 1990, deer elk populations have grown, OHVs can no longer leave designated routes, and it is time to amend the plan in regards to Winter Range. MRA asks that the FS look at closures on a trail by trail basis, reduce the 6 month closure, and allow OHVs on certain trails within the Winter Range, including Charlie Buck, Baldy Peak, Little Grayback, Mule Mtn., and Mule Creek, when it will not conflict with winter range values, and that all non-motorized trails or areas that persons will walk in Winter Range must have the same seasonal restrictions as motorized trails.

Page 33 of the EA under **C-3 Provide additional opportunities for non-motorized recreation** that "A maintenance strategy would be developed for existing and new trails". MRA has doubts that adequate maintenance for the 18 miles of new non-motorized trails can be done considering lack of funding by the FS and lack of desire by hikers to perform maintenance. MRA has already proven that they are a big part of trail maintenance for multi-use trails, so we have no doubts that the proposed multi use trails will be maintained. MRA is offering to make a formal agreement with the FS to help maintain all multi-use trails in the Applegate for 5 years. We would like to see the strategy plan before we can support new non-motorized trails.

MRA objects to the closing of Ladybug Gulch to motorcycles. This has been a long used "Dual Sport" (licensed on and off road motorcycles) route and an important connection from Tallowbox Mountain to Star Gulch. We ask that this access remain open to small

motor vehicles. Environmental impact can be mitigated with bridges, water bars, and other erosion control measures.

The LMRP requires the FS to “Provide a balance of resource management activities...” and “Offer a wide range of developed and dispersed recreational opportunities by providing recreational settings, access, facilities, and education to meet public demand”. The current condition does not meet the demand for motorized trails or offer balance. “OHV use is widely recognized as one of the fastest growing recreation activities in the US” (TMP DROD III-37), yet you reduced motorized single track trails in the 2016 TMP by about 53 miles plus dozens of miles of non-inventoried trails. The amount of motorized trails in RRSNF is way below other national forests. The average amount of motorized trails in National Forests in the US is 38% compared to 62% non-motorized (USDA National Strategy for a Sustainable Trail System FS-1095a, Nov 2017). In the Rogue River Siskiyou NF the amount of motorized is only 15% compared to 85% non-motorized. In the UAWRP area there are currently only 2.8 miles of motorized trails on NF land. The proposed 5.5 miles of multi-use trail will be part of a 25 mile existing multi-use trail system that has been happily shared by hikers, bikers, horses and motorcycles and maintained by the motorcycle riders for 50 years. The proposed multi use trails are mostly on existing trails and road beds which have been used by motorcycle riders for many years. The proposed project includes about 18 miles of non-motorized trails and about 5.5 mile of multi-use, this is approximately 1/3 motorized to 2/3 non-motorized, still below the national average.

The new proposed trails will offer better loops and trail connectivity to existing routes. This will result in less "up and back" hiking and riding on dead end trails, thus reducing impacts.

New trails can and will be used in the future for fuel breaks and access for firefighting.

The proposed motorized trails will likely be closed to motorcycles for at least 2 to 3 months a year for fire season and some possibly 6 months for Winter Range and some possibly 3 months a year for owl nesting, thus giving people who wish to recreate in solitude ample time to do it.

The proposed motorized trails are important to provide to provide a remote feeling single track experience. Most off road motorcycle riders do not like roads, they need the challenge of their skills and the exercise found only in varying terrain with rocks, logs, turns, up and down hills. Roads, to us, are only a way to get to the next trail, and road sections over a mile long become boring and dangerous. These trails will help keep us off of mixed use roads for better safety and a more satisfying experience.

Jack Leroy- President and Chuck Steahly-executive committee